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Apple Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

COREPHOTONICS, LTD.

Plaintiff,

vs.

APPLE INC.

Defendant.

Case No. 3:17-cv-06457-JD (lead case)
Case No. 5:18-cv-02555-JD

**DECLARATION OF LOWELL MEAD IN
SUPPORT DEFENDANT'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

I, Lowell Mead, declare:

1. I am an attorney with Cooley LLP and counsel in this action for Defendant Apple Inc. (“Apple”). I submit this declaration in support of Apple’s Administrative Motion to File Under Seal.

2. The information sought to be sealed is narrowly tailored:

Item #	Materials Sought to be Sealed	Sealing Request
1	FIRST AMENDED ANSWER TO FIRST AMENDED COMPLAINT - Case No. 3:17-cv-06457-JD: <ul style="list-style-type: none"> page 14, lines 12-13 pages 14-15, lines 21-14 page 15, lines 16, 21, 22, 23-24, 28 page 16, lines 1-2, 3-7, 8, 10-11, 16, 26-27 	Narrowly tailored portions of First Amended Answer describing highly confidential terms and the confidential identity of signatories to the agreement
2	FIRST AMENDED ANSWER TO COMPLAINT FOR PATENT INFRINGEMENT - Case No. 5:18-cv-02555-JD: <ul style="list-style-type: none"> page 11, lines 6-7, 15-28 page 12, lines 1-8, 10, 15-18, 22-28 page 13, lines 1-2, 4-5, 10, 20-21 	Narrowly tailored portions of First Amended Answer describing highly confidential terms and the confidential identity of signatories to the agreement

3. These materials contain information that was produced as and designated as “Confidential – Attorneys’ Eyes Only” under the Protective Order (Dkt. 77), including based on third-party confidentiality.

4. The highly confidential and sensitive materials Apple seeks the Court’s permission to file under seal relates to highly confidential information from an agreement entered into by Apple and a third party that is subject to third-party confidentiality obligations. I understand that the existence and the terms of the agreement are highly confidential and reflect sensitive business strategies and discussions.

5. Both compelling reasons and good cause exist to permit Apple to file the narrowly tailored requested information under seal, as public disclosure of this information would harm Apple and the third-party signatory to the agreement at issue, and such information, if revealed to the public, could be misused by competitors and adversaries to harm the

1 signatories.

2 I declare under penalty of perjury that the foregoing is true and correct. Executed on
3 December 22, 2023 in Palo Alto, CA.
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5 /s/ Lowell Mead

6 Lowell Mead
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